

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WARNER BROS. ENTERTAINMENT INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 24-cv-09867

Judge Andrea R. Wood

Magistrate Judge Jeffrey T. Gilbert

DECLARATION OF MARTIN F. TRAINOR

I, Martin F. Trainor, of the City of Chicago, in the State of Illinois, declare and state as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am an attorney for Warner Bros. Entertainment Inc. ("WBEI" or "Plaintiff"). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as witness, I could and would competently testify as follows:
2. I, or someone working under my direction, have reviewed the storefronts and product listings for the Defendants' Seller Aliases and have confirmed the storefronts appear to use fictitious addresses that do not clearly identify a selling entity and/or its contact information.
3. In my experience filing trademark infringement and counterfeiting, copyright infringement, and design patent infringement cases involving foreign-based defendants, I have encountered a multitude of situations where defendants operate multiple e-commerce

stores that lack narrow, specific identifiers, but are commonly owned by a single individual or entity.

4. **Exhibit 1** attached hereto is a true and correct copy of the unpublished decisions cited in WBEI's Memorandum Establishing that Joinder is Proper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2024 in Chicago, Illinois.

/s/ Martin F. Trainor
Martin F. Trainor